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April 23, 2020

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Via ECF

Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl St. New York, New York 10007

Re: United States v. Velazquez, et al. (Antonio Burgos), 19 Cr. 116

Dear Judge Wood:

The undersigned represents Antonio Burgos in the above-captioned matter and write with regards to Mr. Burgos's sentencing hearing. On April 14, 2020, due to counsel's inability to speak to Mr. Burgos (currently held at the MCC) about his upcoming sentencing hearing, we respectfully requested a one-week extension for his sentencing submission. Your Honor granted that request on April 23, 2020.

We were able to speak to Mr. Burgos on April 21, 2020 for approximately thirty-minutes. Immediately following that call, we again contacted the Federal Defenders, pursuant to the latest protocol, to request additional legal calls with our client. As of the date of this letter, a second call has not been scheduled.

Due to our very limited access to Mr. Burgos, we still have been unable to adequately prepare for our client's upcoming sentencing submission. Additionally, in our communications with the Federal Defenders, we were informed that we may not be able to schedule calls with Mr. Burgos on a regular basis due the process implemented at the MCC and the high-volume of legal calls being requested. Finally, we have not yet received the draft Presentence Report from Probation.

Due to these circumstances, and with Mr. Burgos' consent we now respectfully request an adjournment of Mr. Burgos' sentencing hearing until the week of June 8, 2020, or to a date

Case 1:19-Gr-001116-KMW DOCHMENT 1991 Filled 04/23/20 Page 2-012

and time convenient to the Court. We have discussed our request with the government, and the government has no objections.

We are, of course, available at the Court's convenience should Your Honor require further information on this matter.

Respectfully submitted,

/s/

Gregory Morvillo

Sentencing is adjourned to June 18. 2000, at 11:00 a.m. Defendants Submission is due by June 4, 2020. Government Submission is due by June 11, 2020.

cc: AUSA Michael Krouse
AUSA Adam Hobson
U.S. Probation Officer Jill Jefferies

Kindr M. Word 4/27/20 SO ORDERED